

## Remarks

Claims 1, 3-8, 10-14, and 21-26 are pending in the application. Claims 1, 3-8, 10-14, and 21-26 are rejected. Claims 1 and 8 are amended herein. No new matter is added. All rejections are respectfully traversed.

The Applicants note with disappointment the Examiner's withdrawal of his indication of allowability and his assertion of new, but inapplicable art.

Claims 1, 3-8, 10-14, and 21-26 are rejected under 35 U.S.C. 112, second paragraph. The Examiner indicates claim 16 recites a phrase with no antecedent basis. However, claim 16 was cancelled in a previous response. Claims 1 and 8 are amended to replace "hardware" with "data concentrator" which the Applicants believe was the intent of the rejection. There was no apparent reason to reject claims 21-26 based on 35 U.S.C. 112, second paragraph.

The Examiner indicates claims 1-18 are rejected under 35 U.S.C. 102(e) as being anticipated by Henry, et al. (U.S. 7,058,059 – "Henry"). The Applicants note that claims 2, 9, and 15 – 18 were cancelled in the previous action. However, the Examiner goes on to address claims 1, 3-8, 10-14, and 21-26 by applying Henry.

Regarding Independent claims 1, 8, and 21, Henry describes an intelligent device that emulates a standard network interface for a mobile host, e.g., personal computer, information appliance, personal data assistant, wireless

handset, see, col. 7, lines 24-28. There are a number of striking distinctions between the intelligent device of Henry and what is claimed.

First, claimed is a second interface for communicatively coupling said intelligent data concentrator to a plurality of said client devices such that each said client device is communicatively coupled to said Ethernet LAN. In contrast, the intelligent device described by Henry serves as an interface for only one device, i.e., the mobile host. The intelligent device acts as a translator so that it doesn't matter what type of network the mobile host is connected to, e.g., CDPD or WLAN, the intelligent device encapsulates the packets into Ethernet packets, see col. 8, lines 7-16, below:

Referring now to FIG. 3, the MH 300 does not differentiate between the CDPD and WLAN interfaces. Instead, it "sees" an "emulated" Ethernet interface at the intelligent device 302. At 304, the MH 300 sends a DHCP DISCOVER message to the intelligent device 302 in an IP packet with 0.0.0.0 as the source IP address and 255.255.255.255 as the destination IP address. The IP packet is packaged into an Ethernet frame with MAC 1 as the source MAC address and an Ethernet broadcast address (MAC<sub>broadcast</sub>) as the destination broadcast message. After

Basically, the distinction above can be describes as follows:

Henry connects a single device (mobile host) to one of multiple types of networks, but only one at a time. The invention connects multiple devices to a single network. Therefore, henry can never anticipate what is claimed.

Further, claimed is said intelligent data concentrator is configured to be mounted internally within a wall such that a user-accessible surface of the intelligent data concentrator is external to and substantially planar with an exterior surface of the wall to provide direct access to said intelligent data concentrator. The Examiner points to Figure 2, but clearly did not read any text in Henry describing Figure 2. The intelligent device described in Henry

is mounted to the mobile host, or is integral to the mobile host, i.e., a logical module that appears as an intermediate network device driver, see, e.g., col.

7, lines 28-38, below:

information through a packet-switched data network. Each MHI 200 has an intelligent device that is identified generally by the reference numeral 202. The intelligent device 202 emulates a standard network interface device on a mobile host 200 and controls multiple network interfaces to enable MHI 200 to access different networks. The intelligent device 200 includes a dedicated central processing unit (CPU) 204 and memory 206, thereby operating as an independent microcomputer. In lieu of a pure hardware implementation, the intelligent interface can be a logical module that appears as an intermediate network device driver (such as an NDIS-

Therefore, the Examiner is requested to explain how an intelligent device included in a *mobile* host can anticipate a data concentrator configured to be mounted internally within a wall such that a user-accessible surface of the intelligent data concentrator is external to and substantially planar with an exterior surface of the wall, as claimed. The Applicants respectfully assert that of the mobile host of Henry included an intelligent device mounted within a wall as suggested by the Examiner, the mobile host would certainly not be mobile. The Examiner is requested to identify exactly which part of Figure 2 (below) is a wall:

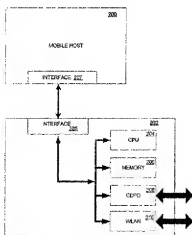


FIG. 2

A person of ordinary skill in the art would readily understand that Figure 2 does not show a wall, but instead is an illustration of an interface device connected to the mobile host, see, e.g., col. 6, lines 43-45, below:

FIG. 2 is a schematic of a network access device (mobile  
host) and an intelligent device or combo card connected  
45 thereto;

Figure 2 does not teach a wall or any device configured to be mounted internally within a wall, as claimed. Figure 2 shows an interface card for insertion into a mobile computer. Therefore, Henry can never anticipate what is claimed. The rejection should be reconsidered and withdrawn.

Further still, claimed is a second interface for communicatively coupling said intelligent data concentrator to a plurality of said client devices such that each said client device is communicatively coupled to said Ethernet LAN. As stated above, The intelligent device of Henry can only connect a single device (the mobile host) to an Ethernet LAN. See also col. 11, lines 8-11, below:

Referring now to FIG. 8, there is depicted a flow diagram of handoff signaling as a MH 800 roams between a CDPD network 804 and an office LAN 806, assuming the mobile 10 host is already "statically" connected to the office network.

Not only does this fail to teach multiple devices connected to an Ethernet LAN as asserted by the Examiner, but it also shows that the intelligent device described by Henry can only connect the mobile host to a single network at one time, thus the "handoff" between CDPD and office LAN. It should now be readily understood that Henry and the invention are very different and that Henry can never anticipate what is claimed.

Further still, the intelligent device described by Henry is not a data concentrator. There is absolutely no teaching anywhere in Henry, and particularly at col. 8, lines 35-43, that the intelligent device is a data concentrator, see below:

35 MAC address, and sends the frame to the MH 300 at 312.  
The emulated Ethernet device will cause a hardware inter-  
ruption to notify the operating system of the MH 300. The  
MH 300 accepts the "faked" DHCP\_OFFER message from  
the intelligent device 302, and then sends a DHCP\_RE-  
40 QUEST message back to the intelligent device 302 at 314.  
This message uses IP<sub>MH3@CDPD</sub> as the source IP address and  
the "faked" IP<sub>DHCP@CDPD</sub> as the destination IP address. At

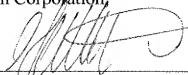
It is apparent that the intelligent device operates serially, and does not perform data concentration, e.g., multiplexing, at all. This is yet another reason Henry can never anticipate what is claimed.

Dependent claims 3-7, 10-14, and 22-26 include all of the limitation of their associated independent claims and therefore can never be anticipated by Henry for at least the reasons stated above.

It is believed that this application is now in condition for allowance. A notice to this effect is respectfully requested. Should further questions arise concerning this application, the Examiner is invited to call Applicant's attorney at the number listed below. Please charge any shortage in fees due in connection with the filing of this paper to Deposit Account 50-3650.

Respectfully submitted,  
3Com Corporation,

By

  
\_\_\_\_\_  
Andrew J. Curtin  
Attorney for the Assignee  
Reg. No. 48,485

350 Campus Drive  
Marlborough, MA 01752  
Telephone: (508) 323-1330  
Customer No. 56436